

WHEREAS, there are no pending dates set by the Court that would be affected by this extension;

THEREFORE, IT IS STIPULATED AND AGREED by and between the undersigned parties:

1. The undersigned counsel for Defendants agree to accept service of the complaint on behalf of Defendants, without waiving any defenses other than failure of service of process, and specifically preserving the defense of lack of personal jurisdiction.

2. Plaintiff agrees that Defendants need not respond to the complaint.

3. The parties shall confer as to an appropriate schedule for Plaintiff to amend the complaint, and for Defendants to answer, move to dismiss or otherwise respond to that amended complaint, once the Court issues its anticipated order on the Second Tranche Motion to Dismiss.

4. BP p.l.c., BP America Inc. and BP Exploration & Production Inc. will make available to Plaintiff all documents and other discovery produced by any BP entity in *In re Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico, on April 20, 2010*, MDL 2179 (E.D. La.) ("MDL 2179") and MDL 2185, and will not object to Plaintiff gaining access to all documents and discovery produced by other parties in MDL 2179 and MDL 2185, on substantially the same terms as governs the use of those documents by plaintiffs in MDL 2179 and MDL 2185. In any event, the deadline for amending the complaint shall not be less than 60 days following entry of such order.

Dated: July 11, 2014

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IT IS SO ORDERED.

Signed: July 11, 2014

HON. KEITH P. ELLISON
UNITED STATES DISTRICT JUDGE